

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and
all other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official capacity as Governor of South Carolina; HARVEY PEELER, in his official capacity as President of the Senate; LUKE A. RANKIN, in his official capacity as Chairman of the Senate Judiciary Committee; JAMES H. LUCAS, in his official capacity as Speaker of the House of Representatives; CHRIS MURPHY, in his official capacity as Chairman of the House of Representatives Judiciary Committee; WALLACE H. JORDAN, in his official capacity as Chairman of the House of Representatives Elections Law Subcommittee; HOWARD KNABB, in his official capacity as interim Executive Director of the South Carolina State Election Commission; JOHN WELLS, JOANNE DAY, CLIFFORD J. ELDER, LINDA MCCALL, and SCOTT MOSELEY, in their official capacities as members of the South Carolina State Election Commission,

Defendants.

Case No.: _____

**PLAINTIFFS' ANSWERS TO
LOCAL RULE 26.01
INTERROGATORIES**

Plaintiffs answer Interrogatories as directed by Local Rule 26.01 as follows:

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Answer: None.

- B. As to each claim, state whether it should be tried jury or nonjury and why.

Answer: Each claim should be tried nonjury because they involve the resolution of constitutional or legislative questions of law and seek injunctive and declaratory relief instead of monetary damages. Moreover, a three-judge panel is appropriate pursuant to 28 U.S.C. § 2284(a) because Plaintiffs are challenging the constitutionality of the apportionment of South Carolina's congressional districts and the apportionment of South Carolina's statewide legislative body.

- C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer: Plaintiffs are not publicly owned companies.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: The Columbia Division is the appropriate division pursuant to Local Rule 3.01 because all Defendants, as sued in their official capacities, are based in Columbia, South Carolina. Each entity that Defendants represent does business related to the events alleged in the Columbia Division and throughout the state.

- E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: No.

Dated: October 12, 2021

Respectfully submitted,

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